

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION**

WILL CO. LTD. a limited liability company
organized under the laws of Japan,

Plaintiff,

vs.

KA YEUNG LEE, an individual; YOUHAHA
MARKETING AND PROMOTION LIMITED,
a foreign company; and DOES 1-20, d/b/a
THISAV.COM,

Defendants.

Case No.: 3:20-cv-05802-BHS

**DECLARATION OF JASON TUCKER
IN SUPPORT OF PLAINTIFF WILL
CO.'S OPPOSITION TO MOTION TO
DISMISS FOR LACK OF PERSONAL
JURISDICTION**

I, Jason Tucker, declare:

1. I am a United States Citizen, over the age of 18 years old, make this declaration based upon personal knowledge and, if called to testify could and would testify competently to the facts set forth herein.

2. I am the President of Battleship Stance Inc. ("Battleship"), a leading intellectual property management and anti-piracy enforcement company. Our clients include award-winning

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FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98042
(253) 383-4500 - (253) 383-4501 (fax)

1 news, Emmy and Golden Globe winning mainstream production companies, individuals, and
2 studios, and adult entertainment studios including Plaintiff.

3 3. Battleship is retained by some of the world's largest intellectual property rights
4 owners to provide intellectual property management, anti-piracy, and support services.

5 4. I have been in the business of legal adult entertainment production (both on and
6 off the Internet), marketing, and management at technical and executive level for over ten (15)
7 years, serving for over six (6) years as President of a company that owned and licensed one of the
8 world's largest libraries of niche specific erotic images, Falcon.

9 5. For over a decade and at the dawn of the Internet, Falcon was the leading supplier
10 of niche content to the print publications and internet web sites. Our clients included popular
11 Larry Flynt Publications to highly specific niche publications including Club Asian, Oriental
12 Women, and Asian Beauties.

13 6. Based upon my work for Falcon and as the former owner of domains such as
14 erotica.com, I am familiar with both the adult entertainment industry and the business of sale of
15 adult entertainment on the Internet and niche content on the Internet.

16 7. I am a graduate of the FBI and DEA Citizens Academy and a member of
17 InfraGard. I have received advanced training by both agencies that in turn have furthered my
18 ability to assist seeking out and defining operations and pirate enterprises. My efforts have been
19 acknowledged with awards from State of California Senate, the FBI, DEA, and Los Angeles
20 Sheriff's Department as a few examples.

21 8. I have served as a consultant to Fortune 100 companies including Microsoft
22 Corporation for the rollout of several versions of Windows Media and in the development and
23 roll out of their Digital Rights Management technology and Akamai Technologies among others.

1 9. Akamai Technologies, Inc. is a global content delivery network, cybersecurity,
2 and cloud service company, providing web and Internet security services. Akamai's Edge
3 Platform is one of the world's largest distributed computing platforms.

4 10. At Akamai Technologies, my role was to serve as a consultant and liaison between
5 the executive, sales, network and operations teams and the adult entertainment sector. As adult
6 content was, at the time, and arguably still is the most viewed content on the internet, Akamai
7 wanted to deliver the bandwidth and provide content delivery (CDN) services for the adult sector
8 at the same level and same speed they did clients CNN and Yahoo!. With our collective
9 understanding of network operations and my understanding of the needs of content delivery in
10 the adult sector we created a global network map that site owners could leverage based on where
11 they wanted to target. Though the entire map could service the world, site operators map out and
12 only paid for the portions they needed to use. Simply because you don't pay for servers you don't
13 foresee using.

14 11. As an experienced executive within the adult entertainment industry, I have been
15 featured and quoted in publications including Newsweek, BusinessWeek, USA Today, Wired,
16 and the Washington Post and frequently am requested to speak on panels and at seminars at
17 industry events on various industry related topics and trends including anti-piracy.

18 12. Japanese erotica is a significant niche in the U.S. market with high demand. For
19 instance, on Pornhub.com, the most popular adult entertainment web site in the world, Japanese
20 content stood at the top of most searched content in 2018 and in the top 3 in 2017, and numbers
21 two and four in the United States in 2019. I found these statistics on
22 <https://www.pornhub.com/insights/women-of-the-world>,and
23 <https://www.pornhub.com/insights/2019-year-in-review>.

24 13. Japanese erotica popularity equates to the potential to earn significant money in
25 the U.S. market. It also raises the probability of piracy of Japanese content.

14. Web sites displaying copyrighted works without authorization earn money by selling advertising space on the web site. The higher quality and higher quantity of the videos displayed on the video streaming sites, the more advertising revenue will be generated.

15. The higher the quality and true to the niche a film or image is, the more desirable and valuable the content. This is very important with Japanese content. Japanese models are expensive, with 100% Japanese models highly sought after. Where a United States model may be compensated \$500 for a shoot, it is not uncommon to pay \$10,000 for the same shoot with a Japanese model. Similar to fans of sports, fans of Japanese content know their favorite models.

16. Advertising revenue in the U.S. is among the highest in the world, so generating viewers in the U.S. for these videos streaming sites is important.

17. Battleship Stance Inc. was retained by Will Co. Ltd. to investigate copyright violations and assist in enforcing its intellectual property rights.

18. As a part of my duties to Will Co. Ltd., I investigated the web site ThisAV.com. In doing so, I have located 13 works on 19 separate and distinct ThisAV.com Uniform Resource Locators (URLs, the unique address of each page displayed on the Internet) owned by Will Co. with United States copyrights that are displayed on ThisAV.com without license or authority.

19. Through subpoenas, we discovered Ka Yeung Lee (“Lee”) and Youhaha Marketing and Promotion (“YMP”) are owners or operators of ThisAV.com. Lee and YMP are listed as “clients” on the records for ThisAV.com account with the company Gorilla Servers, providing hosting services for ThisAV.com. YMP is also listed as a contact on the Tiger Media account.

20. Based upon the records provided by Gorilla Servers, Lee and YMP pay for the services using United States based PayPal, Inc.

21. ThisAV.com expressly provides for a video/content take-down procedure, stated to be consisted with the DCMA, referring to the Digital Millennium Copyright Act, which

1 provides in part for take-down procedures for copyright infringement on web sites, providing
2 protection of the site owner from liability.

3 22. On behalf of Will Co., I supervised and submitted DMCA compliant take down
4 notices sent to ThisAV.com in June and July 2020 pursuant to the procedures stated on the
5 ThisAV.com web site. Will Co's movies were not removed from ThisAV.com after I sent the
6 takedown notices.

7 23. The majority of the web site is in Japanese. However, such does not indicate sole
8 intention to market to Japan. Maintaining the Japanese language on the site is consistent with the
9 desire of those participating in the niche market of Japanese erotica. The viewers/users of the
10 niche desire an immersive experience in the Japanese experience, which includes most of the text
11 on the site to be in Japanese.

12 24. Pages of the ThisAV.com are in English, including (1) Terms and Conditions; (2)
13 Privacy Policy; (3) DMCA; (4) 2257; (5) Advertise; and (6) User Feedback.

14 25. Attached hereto as Exhibit A is a true and correct copy of the Terms and
15 Conditions from ThisAV.com.

16 26. Attached hereto as Exhibit B is a true and correct copy of the Privacy Policy from
17 ThisAV.com.

18 27. Attached hereto as Exhibit C is a true and correct copy of the DMCA page from
19 ThisAV.com.

20 28. Attached hereto as Exhibit D is a true and correct copy of the 2257 page from
21 ThisAV.com.

22 29. Attached hereto as Exhibit E is a true and correct copy of the Advertise page from
23 ThisAV.com.

24 30. Attached hereto as Exhibit F is a true and correct copy of the User Feedback page
25 from ThisAV.com.

31. The “DMCA” page expressly refers to the Digital Millennium Copyright Act, a statutory scheme governing copyright infringement liability and safe harbors applicable only in the U.S. I am familiar with this United States code as it dictates the form of takedown notices to send to internet service providers, which is a service provided by Battleship Stance. To comply with the DMCA, ThisAV.com provides a specific email address to send takedown notices, copyright@thisav.com.

32. The “2257” page expressly refers to 18 U.S.C. § 2257, which imposes in part certain and specific records keeping requirements regarding models used in online adult entertainment. Through my work for Falcon and Battleship Stance I am very familiar with § 2257 requirements and that the United States Federal Bureau of Investigations investigates compliance with these record keeping requirements. Such is to, in part, ensure that underage models are not used in production of online adult entertainment content. On ThisAV.com, an email address is provided, compliance@ThisAV.com for anyone inquiring about 2257 records.

33. Defendants also refer to § 2257 in the various video upload options available on ThisAV.com. In each instance, the uploader is informed that by uploading the video they are indicating they will produce § 2257 records upon request. Attached here to as Exhibit G is a true and correct copy of the ThisAV.com page regarding video uploads directly to the web site.

34. ThisAV.com origin server is hosted on a server in the State of Utah with a United States Company, Gorilla Servers.

35. ThisAV.com is also served to viewers via a content delivery network (CDN), Cloudflare, Inc. Attached hereto as Exhibit H is a true and correct copy of DomainTools look up, a known and accepted Internet tool, which shows ThisAV.com being displayed to the United States through Cloudflare.

36. Cached edge delivery in the United States is one of the services provided by Cloudflare for ThisAV.com.

1 37. A CDN is used to deliver content over the Internet in a fast and efficient manner
2 when the originating servers (where the web site is hosted) is far away. It is a highly-distributed
3 platform of servers that helps minimize delays in loading web page content by reducing the
4 physical distance between the server and the user. This helps users around the world view the
5 same high-quality content without slow loading times.

6 38. The CDN sever is geographically local to the intended audience. Speed is
7 everything to end users seeking video on the Internet. The closer the content to the end user, the
8 faster and more efficient the content can be delivered.

9 39. CDN design and server locations are not accidental, but rather specific choices to
10 server specific audiences in an efficient manner.

11 40. Cached edge delivery reduces the number of requests to an origin server by serving
12 static content from a Cloudflare data center. It's a Content Delivery Network that can serve
13 content from the edges of the internet. The benefit of cached edge delivery is speed of delivery of
14 content. By caching web site content on servers closest to the end users, Cloudflare helps improve
15 load speeds to end users. Speed and quality is everything in an online experience. Whether
16 Cloudflare caches static content depends on where visitors come from, which Cloudflare data
17 center is reached, and how often visitors request a resource or data at a specific center. This
18 information is located at [https://support.cloudflare.com/hc/en-us/articles/200172516-](https://support.cloudflare.com/hc/en-us/articles/200172516-Understanding-Cloudflare-s-CDN)
19 [Understanding-Cloudflare-s-CDN](https://support.cloudflare.com/hc/en-us/articles/200172516-Understanding-Cloudflare-s-CDN).

20 41. I am aware that it is claimed ThisAV.com utilizes Cloudflare to assist with the
21 delivery of web pages and videos in all countries throughout the world. I investigated this claim.
22 I used an Internet site, www.whatsmycdn.com, and inputted ThisAV.com. The results indicated
23 that the Cloudflare CDNs provide server only in Asia and North America. Attached hereto as
24 Exhibit I is a true and correct copy of the results I obtained.

42. Generally speaking, Internet companies build CDN network maps based upon need. Each server used in a network map costs money. In concert with the Founder of Akamai Technologies Danny Lewin, we did network map plotting, including for CDNs to enhance site speed through edge delivery for companies including Playboy Entertainment, Hustler, Danni's Hard Drive (DHD Media), Vivid Video, CyberErotica, and Wicked Pictures.

43. It makes no sense to pay for CDN servers in locations that are not regularly being hit by traffic. For instance, a company would not map for servers targeting India unless the company wanted to speed up and serve India at a better rate.

44. ThisAV.com earns money from the sale of advertisement space on the site.

45. The owners and operators of the site contract with ad broker Tiger Media (a.k.a. Juicy Ads). Tiger Media is headquartered in Canada and operates servers located in the U.S. All advertisements displayed to end users are displayed from those United States servers.

46. Advertising on ThisAV.com is geo-targeted to United States viewers.

47. Geo-targeting means that when a viewer is known to be from the United States from the users IP address, advertisements for United States vendors or providers are displayed to the viewer.

48. There are clearly United States vendors that advertise on ThisAV.com, including Multi Media, d/b/a Chaturbate.

49. From March to May 2020, the U.S. was the fourth largest viewer base for the ThisAV.com site. During this time, 27.12 million people viewed ThisAV.com. The United States comprised 4.31% of those visitors, making 1,168,872 United States viewers. Attached hereto as Exhibit J is true and correct copy of a web site analysis obtained from SimilarWeb, an industry accepted tracking of web sites.


50. From December 2020 to February 2021, the U.S. still was the fourth largest viewer base for the ThisAV.com site. During this time, 28.93 million people viewed ThisAV.com. The

1 United States comprised 4.91% of those visitors, making 1,420,463 United States viewers.
2 Attached hereto as Exhibit K is true and correct copy of a web site analysis obtained from
3 SimilarWeb, an industry accepted tracking of web sites.

4 51. Documents from Gorilla Servers were obtained by subpoena in this case, and then
5 provided to me for review. These records show that on at least 12 occasions between January
6 2018 and August 2020, ThisAV.com received notices of potential exploitation of children on the
7 site from the National Center for Missing and Exploited Children. These notices were sent to
8 Gorilla Servers. Attached hereto as Exhibit L are true and correct copies of the records from
9 Gorilla Servers.

10
11 I declare under the penalty of perjury under the laws of the United States of America that
12 the foregoing is true and correct.

13 Execute on the 29th day of March, 2021 at Nayarit, Mexico.

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17 Jason Tucker
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26 DECLARATION OF JASON TUCKER ISO
PLAINTIFF'S OPPOSITION TO MOTION TO DISMISS
[NO. 3:20-cv-05802-BHS]

- 9

FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98042
(253) 383-4500 - (253) 383-4501 (fax)

EXHIBIT A

Terms and Conditions from **ThisAV.com**



My Home



Inbox (0)



Requests (0)



Bookmark



Logout



Support / Feedback · ThisAV Notices

HOME

FREE SEX

LIVE CAM

VIDEOS

CATEGORIES

PHOTOS

Tags: 川いおり 永瀬ゆい 渚みつき あべみかこ 相沢

Videos ▾

Search

[advanced search]

UPLOAD

Terms And Conditions

1. ACCEPTANCE

By using and/or visiting the ThisAV website (collectively, including but not limited to all Content, Uploads and User Submissions available through ThisAV.com, "ThisAV", the website) you agree to the terms and conditions contained herein and the terms and conditions of ThisAV's privacy policy incorporated herein, and all future amendments and modifications (collectively referred to as the "Agreement"). By entering, you agree to be bound by these terms and conditions. If you do not agree to be bound the terms and conditions contained herein, then do not use ThisAV.com.

The terms and conditions of this Agreement are subject to change by ThisAV at any time in its sole discretion and you agree be bound by all modifications, changes and/or revisions. If you do not accept to be bound by any and all modifications, changes and/or revisions of this agreement, you may not use ThisAV.com.

The terms and conditions contained herein apply to all users of ThisAV whether a 'visitor' or a 'member' and you are only authorized to use ThisAV.com if you agree to abide by all applicable laws and be legally bound by the terms and conditions of this Agreement.

2. DESCRIPTION OF SERVICES

The ThisAV website allows for uploading, sharing and general viewing various types of content allowing registered and unregistered users to share and view visual depictions of adult content, including sexually explicit images. In addition, ThisAV contains video content, information and other materials posted/uploaded by users. ThisAV allows its users to view the Content and Website subject to the terms and conditions of this Agreement.

The ThisAV website may also contain certain links to third party websites which are in no way owned or controlled by ThisAV. ThisAV assumes no responsibility for the content, privacy policies, practices of any and all third party websites. ThisAV cannot censor or edit the content of third party sites. You acknowledge that ThisAV will not be liable for any and all liability arising for your use of any third-party website.

ThisAV.com is for your personal use and shall not be used for any commercial endeavor except those specifically endorsed or approved by ThisAV.com. Any illegal and/or unauthorized use of ThisAV is prohibited including but not limited to collecting usernames and e-mail addresses for sending unsolicited emails or unauthorized framing or linking to the ThisAV website is prohibited.

3. ACCESS

In order to use this website, you affirm that you are at least eighteen (18) year of age and/or over the age of majority in the jurisdiction you reside and from which you access the website where the age of majority is greater than eighteen (18) years of age. If you are under the age of 18 and/or under the age of majority in the jurisdiction you reside and from which you access the website, then you are not permitted to use the website.

4. USER CONDUCT

You acknowledge and agree that you shall be responsible for your own user submissions and the consequences of posting, uploading, publishing transmitting or other making them available on ThisAV. You agree that you shall not (nor others using your account) post, upload, publish, transmit or make available in any way on ThisAV content which is illegal, unlawful, harassing, harmful, threatening, tortuous, abusive, defamatory, obscene, libelous, invasive of one's privacy including but not limited to personal information, hateful, racial. You also agree that you shall not post, upload, publish, transmit or make available in any way on ThisAV software containing viruses or any other computer code, files, or programs designed to destroy, interrupt, limit the functionality of, or monitor, or persistently reside in or on any computer software or hardware or telecommunications equipment. You agree that you shall not (nor others using your account) post, upload, publish, transmit or make available in any way on ThisAV content which is intentionally or unintentionally violating any applicable local, state, national, or international law, or any regulations or laws having the force of law where you reside and elsewhere, including but

not limited to any laws or regulations relating to securities, privacy, and export control; engage in, promote, You agree that you shall not (nor others using your account) post, upload, publish, transmit or make available in any way on ThisAV content depicting illegal activities, promote or depict physical harm or injury against any group or individual, or promote or depict any act of cruelty to animals; You agree not to use ThisAV in any way that exposes ThisAV to criminal or civil liability.

You agree that ThisAV shall have the right to determine in its sole and unfettered discretion, what action shall be taken in the event of any discovered or reported violation of the terms and conditions contained herein.

5. INTELLECTUAL PROPERTY

The Content contained on the ThisAV with the exception of User Submissions including but not limited to the text, software, scripts, graphics, music, videos, photos, sounds, interactive features and trademarks, service marks and logos contained therein, are owned by and/or licensed to ThisAV, subject to copyright and other intellectual property rights under United States Canada and foreign laws and international conventions. Content on the Website is provided to you AS IS for your information and personal use only and may not be used, copied, reproduced, distributed, transmitted, broadcast, displayed, sold, licensed, or otherwise exploited for any other purposes whatsoever without the prior written consent of the respective owners. ThisAV reserves all rights not expressly granted in and to the Website and the Content. You agree to not engage in the use, copying, or distribution of any of the Content other than expressly permitted herein, including any use, copying, and/or distribution of User Submissions of third parties obtained through the Website for any commercial purposes. If you download or print a copy of the Content for personal use, you must retain all copyright and other proprietary notices contained therein. You agree not to disable, circumvent, or otherwise interfere with security related features of the ThisAV or features that prevent or restrict use or copying of any Content or enforce limitations on use of the ThisAV Website or the Content therein.

6. USER SUBMISSIONS

ThisAV permits the submission of video and other communications and the hosting, sharing and publishing of such user submissions. You understand that whether or not such User Submissions are published and/or uploaded, ThisAV does not guarantee any confidentiality with respect to any submissions.

ThisAV allows/permits you to link to materials on the Website for personal, non-commercial purposes only.

You shall be solely responsible for any and all of your own User Submissions and the consequences of posting, uploading and publishing them. Furthermore, with User Submissions, you affirm, represent and/or warrant that:

1. you own or retain the necessary licenses, rights, consents, and permissions to use and authorize ThisAV to use all trademarks, copyrights, trade secrets, patents, or other proprietary rights in and to any and all User Submissions to enable inclusion and use of the User Submissions in the manner contemplated by the Website and these Terms of Service; and
2. you will not post, or allow anyone else to post, any material that depicts any person under the age of 18 years and you have inspected and are maintaining written documentation sufficient to confirm that all subjects of your submissions are, in fact, over the age of 18 years.
3. You have the written consent, release, and/or permission of each and every identifiable individual person in the User Submission to use the name or likeness of each and every such identifiable individual person to enable inclusion and use of the User Submissions in the manner contemplated by the Website and these Terms of Service. For clarity, you retain all of your ownership rights in your User Submissions. By submitting the User Submissions to ThisAV, you hereby grant ThisAV a worldwide, non-exclusive, royalty-free, sublicenseable and transferable license to use, reproduce, distribute, prepare derivative works of, display, and perform the User Submissions in connection with the ThisAV Website and ThisAV's (and its successor's) business, including without limitation for promoting and redistributing part or all of the ThisAV Website (and derivative works thereof) in any media formats and through any media channels. You also hereby grant each user of the ThisAV Website a non-exclusive license to access your User Submissions through the Website, and to use, reproduce, distribute, prepare derivative works of, display and perform such User Submissions as permitted through the functionality of the Website and under these Terms of Service. The foregoing license granted by you terminates once you remove or delete a User Submission from the ThisAV Website.

In submitting material (video or other communication), you further agree that you shall not:

4. submit material that is copyrighted, protected by trade secret or otherwise subject to third party proprietary rights, including privacy and publicity rights, unless you are the owner of such rights or have permission from their rightful owner to post the material and to grant ThisAV all of the license rights granted herein;
5. publish falsehoods or misrepresentations that could damage ThisAV or any third party;
6. submit material that is obscene, illegal, unlawful, , defamatory, libelous, harassing, hateful, racially or ethnically offensive, or encourages conduct that would be considered a criminal offense, give rise to civil liability, violate any law, or is otherwise inappropriate;
7. post advertisements or solicitations of business;
8. Impersonate another person. ThisAV does not endorse any User Submission or any opinion, recommendation, or advice expressed therein, and ThisAV expressly disclaims any and all liability in connection with User Submissions. ThisAV does not permit copyright infringing activities and infringement of intellectual property rights on its Website, and ThisAV will remove all Content and User Submissions if properly notified that such Content or User Submission infringes on another's intellectual property rights. ThisAV

reserves the right to remove Content and User Submissions without prior notice or delay. ThisAV will also terminate a User's access to its Website, if they are determined to be an infringer. While pornographic and adult content are accepted, ThisAV also reserves the right to decide in its sole and unfettered discretion, whether Content or a User Submission is appropriate and complies with these Terms of Service for violations other than copyright infringement and violations of intellectual property law, such as, but not limited to, obscene or defamatory material, or excessive length. ThisAV may remove such User Submissions and/or terminate a User's access for uploading such material in violation of these Terms of Service at any time, without prior notice and at its sole discretion.

You understand and acknowledge that when using ThisAV.com, you will be exposed to User Submissions from a variety of sources, and that ThisAV is not responsible for the accuracy, usefulness, safety, or intellectual property rights of or relating to such User Submissions. You further understand and acknowledge that you may be exposed to User Submissions that are inaccurate, offensive, indecent, or objectionable, and you agree to waive, and hereby do waive, any legal or equitable rights or remedies you have or may have against ThisAV with respect thereto, and agree to indemnify and hold ThisAV, its Owners, affiliates, operators, and/or licensors, harmless to the fullest extent allowed by law regarding all matters related to your use of the website. You agree that ThisAV may at its sole discretion have the right to refuse to publish, remove, or block access to any User Submission that is available via the Website or other ThisAV network or services at any time, for any reason, or for no reason at all, with or without notice.

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7. POLICY

ThisAV abides by a ZERO TOLERANCE policy relating to any illegal content. Child Pornography, bestiality, rape, torture, snuff, death and/or any other type of obscene and/or illegal material shall not be tolerated by ThisAV. ThisAV shall not condone child pornography and will cooperate with all governmental agencies that seek those who produce child pornography.

8. FEES

You acknowledge that ThisAV reserves the right to charge for ThisAV services and to change its fees from time to time in its discretion. Further more, in the event ThisAV terminates your rights to use the website because of a breach of this Agreement, you shall not be entitled to the refund of any unused portion of subscription fees.

9. WARRANTIES

You represent and warrant that all of the information provided by you to ThisAV to participate in the ThisAV website is accurate and current and you have all necessary right, power, and authority to enter into this Agreement and to perform the acts required of you hereunder.

As a condition to using the ThisAV, you must agree to the terms of ThisAV's privacy policy and its modifications. You acknowledge and agree that the technical processing and transmission of the Website, including your User Submissions, may involve transmissions over various networks; and changes to conform and adapt to technical requirements of connecting networks or devices. You further acknowledge and agree that other data collected and maintained by ThisAV with regard to its users may be disclosed in accordance with the ThisAV Privacy Policy.

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10. PERSONAL INJURY OR PROPERTY DAMAGE, OF ANY NATURE WHATSOEVER, RESULTING FROM YOUR ACCESS TO AND USE OF OUR WEBSITE,

11. ANY UNAUTHORIZED ACCESS TO OR USE OF OUR SECURE SERVERS AND/OR ANY AND ALL PERSONAL INFORMATION AND/OR FINANCIAL INFORMATION STORED THEREIN,

12. ANY INTERRUPTION OR CESSATION OF TRANSMISSION TO OR FROM OUR WEBSITE, (IV) ANY BUGS, VIRUSES, TROJAN HORSES, OR THE LIKE WHICH MAY

BE TRANSMITTED TO OR THROUGH OUR WEBSITE BY ANY THIRD PARTY, AND/OR

13. ANY ERRORS OR OMISSIONS IN ANY CONTENT OR FOR ANY LOSS OR DAMAGE OF ANY KIND INCURRED AS A RESULT OF THE USE OF ANY CONTENT POSTED, EMAILED, TRANSMITTED, OR OTHERWISE MADE AVAILABLE VIA THE THISAV WEBSITE. THISAV DOES NOT WARRANT, ENDORSE, GUARANTEE, OR ASSUME RESPONSIBILITY FOR ANY PRODUCT OR SERVICE ADVERTISED OR OFFERED BY A THIRD PARTY THROUGH THE THISAV WEBSITE OR ANY HYPERLINKED WEBSITE OR FEATURED IN ANY BANNER OR OTHER ADVERTISING, AND THISAV WILL NOT BE A PARTY TO OR IN ANY WAY BE RESPONSIBLE FOR MONITORING ANY TRANSACTION BETWEEN YOU AND THIRD-PARTY PROVIDERS OF PRODUCTS OR SERVICES. AS WITH THE PURCHASE OF A PRODUCT OR SERVICE THROUGH ANY MEDIUM OR IN ANY ENVIRONMENT, YOU SHOULD USE YOUR BEST JUDGMENT AND EXERCISE CAUTION WHERE APPROPRIATE. THE FOREGOING LIMITATION OF LIABILITY SHALL APPLY TO THE FULLEST EXTENT PERMITTED BY LAW IN THE APPLICABLE JURISDICTION. YOU SPECIFICALLY ACKNOWLEDGE THAT THISAV SHALL NOT BE LIABLE FOR USER SUBMISSIONS OR THE DEFAMATORY, OFFENSIVE, OR ILLEGAL CONDUCT OF ANY THIRD PARTY AND THAT THE RISK OF HARM OR DAMAGE FROM THE FOREGOING RESTS ENTIRELY WITH YOU.

11. LIMITATION OF LIABILITY

IN NO EVENT SHALL THISAV, ITS OFFICERS, DIRECTORS, EMPLOYEES, OR AGENTS, BE LIABLE TO YOU FOR ANY DIRECT, INDIRECT, INCIDENTAL, SPECIAL, PUNITIVE, OR CONSEQUENTIAL DAMAGES WHATSOEVER RESULTING FROM ANY

14. ERRORS, MISTAKES, OR INACCURACIES OF CONTENT,

15. PERSONAL INJURY OR PROPERTY DAMAGE, OF ANY NATURE WHATSOEVER, RESULTING FROM YOUR ACCESS TO AND USE OF OUR WEBSITE,

16. ANY UNAUTHORIZED ACCESS TO OR USE OF OUR SECURE SERVERS AND/OR ANY AND ALL PERSONAL INFORMATION AND/OR FINANCIAL INFORMATION STORED THEREIN,

17. ANY INTERRUPTION OR CESSATION OF TRANSMISSION TO OR FROM OUR WEBSITE,

18. ANY BUGS, VIRUSES, TROJAN HORSES, OR THE LIKE, WHICH MAY BE TRANSMITTED TO OR THROUGH OUR WEBSITE BY ANY THIRD PARTY, AND/OR

19. ANY ERRORS OR OMISSIONS IN ANY CONTENT OR FOR ANY LOSS OR DAMAGE OF ANY KIND INCURRED AS A RESULT OF YOUR USE OF ANY CONTENT POSTED, EMAILED, TRANSMITTED, OR OTHERWISE MADE AVAILABLE VIA THE THISAV WEBSITE, WHETHER BASED ON WARRANTY, CONTRACT, TORT, OR ANY OTHER LEGAL THEORY, AND WHETHER OR NOT THE COMPANY IS ADVISED OF THE POSSIBILITY OF SUCH DAMAGES. THE FOREGOING LIMITATION OF LIABILITY SHALL APPLY TO THE FULLEST EXTENT PERMITTED BY LAW IN THE APPLICABLE JURISDICTION. YOU SPECIFICALLY ACKNOWLEDGE THAT THISAV SHALL NOT BE LIABLE FOR USER SUBMISSIONS OR THE DEFAMATORY, OFFENSIVE, OR ILLEGAL CONDUCT OF ANY THIRD PARTY AND THAT THE RISK OF HARM OR DAMAGE FROM THE FOREGOING RESTS ENTIRELY WITH YOU.

12. INDEMNITY

You agree to defend, indemnify and hold harmless ThisAV, its parent corporation, officers, directors, employees and agents, from and against any and all claims, damages, obligations, losses, liabilities, costs or debt, and expenses (including but not limited to attorney's fees) arising from:

20. your use of and access to the ThisAV Website;

21. your violation of any term of these Terms of Service;

22. your violation of any third party right, including without limitation any copyright, property, or privacy right; or

23. Any claim that one of your User Submissions caused damage to a third party. This defense and indemnification obligation will survive these Terms of Service and your use of the ThisAV Website.

You affirm that you are either more than 18 years of age or an emancipated minor, or possess legal parental or guardian consent, and are fully able and competent to enter into the terms, conditions, obligations, affirmations, representations, and warranties set forth in these Terms of Service, and to abide by and comply with these Terms and Conditions contained herein.

13. ASSIGNMENT

The Terms and Conditions contained herein and any rights and licenses granted hereunder, may not be transferred or assigned by you, but may be assigned by ThisAV without restriction.

If any term, clause or provision of the agreement is held invalid or unenforceable by a court of competent jurisdiction, such invalidity shall not affect the validity or operation of any term, clause or provision and such invalid term, clause or provision shall be deemed to be severed from this Agreement.

14. JURISDICTION

This Agreement shall be governed by and construed in accordance with the laws of Republic of Panama, without regard to conflicts of law principles. The sole and exclusive jurisdiction and venue for any action or proceeding arising out of or related to this Agreement shall be in an appropriate state or federal court located in the Republic of Panama. You hereby submit to the jurisdiction and venue of said Courts. You consent to service of process in any legal proceeding.

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EXHIBIT B

Privacy Policy from **ThisAV.com**



HOME

FREE SEX

LIVE CAM

VIDEOS

CATEGORIES

PHOTOS

Tags: 与川いおり 永瀬ゆい 渚みつき あべみかこ 相沢

Videos ▾

Search

[advanced search]

UPLOAD

Privacy Policy

Privacy

As a condition to using the Website, you agree to the terms of the ThisAV Privacy Policy as it may be updated from time to time. You acknowledge and agree that the technical processing and transmission of the Website, including your User Submissions, may involve (a) transmissions over various networks; and (b) changes to conform and adapt to technical requirements of connecting networks or devices. You further acknowledge and agree that other data collected and maintained by ThisAV with regard to its users may be disclosed in accordance with ThisAV Privacy Policy.

Cookies

We may set one or more cookies - a small text file on your computer if the web browser accepts them. Cookies are used to identify membership, provide personalized content, track users' submissions, status and activities in order to provide them all proper site functionalities. You can also remove cookies or set your computer to refuse cookies at your discretion, however unaccepted cookies may affect the features on the Thisav.com Website.

IP Address

Every time you access the Internet, servers assess your IP address. Your IP address is a specific number sequence that is used by computer servers and networks to identify your computer.

Site Security

Thisav.com employs customary technical safeguards, firewall and password based security, to protect your privacy and information from unauthorized access to the best of our abilities. However, total security cannot be guaranteed when information is transmitted to ThisAV.com, users must do so at their own risk and discretion.

Thisav.com does NOT release your personal identifiable information to other, third party companies. **We will never release your credit card, Paypal, or similar information to any third parties.**

Information Disclosure

We may disclose your information if we have received your permission beforehand or in the good-faith belief, or such actions in complying with the law or if required to do so by state or federal laws or respond to a subpoena/court order/search warrant. ThisAV.com reserves the right to disclose personal information if we believe, in good faith, it is necessary to investigate against any claims or allegations to protect security of our online services and the property, rights or safety of Avhere.com, our customers or others.

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EXHIBIT C

DMCA Page from
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CATEGORIES

PHOTOS

Tags: 古川いおり 永瀬ゆい 渚みつき あべみかこ 相

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DMCA

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If you believe that your copywriten work has been copied in a way that constitutes copyright infringement, please provide Thisav's copyright agent the following information:

1. A physical or electronic signature of a person authorized to act on behalf of the owner of an exclusive right that is allegedly infringed;
2. Identification of the copyright work claimed to have been infringed, or, if multiple copyrighted works at a single online site are covered by a single notification, a representative list of such works at the Website;
3. Identification of the material that is claimed to be infringing or to be the subject of infringing activity and that is to be removed or access to which is to be disabled, and information reasonably sufficient to permit Thisav to locate the material;
4. Information reasonably sufficient to permit Thisav to contact the complaining party, including a name, address, telephone number and, if available, an email address at which the complaining party may be contacted;
5. A statement that the complaining party has a good-faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent or the law; and
6. A statement that the information in the notification is accurate and, under penalty of perjury, that the complaining party is authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

All claims of copyright infringement on or regarding this Website should be delivered to Thisav's designated copyright agent at the following e-mail address:

copyright@thisav.com, and to flag it as inappropriate by clicking 'flag as inappropriate' link found below each video.

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EXHIBIT D

2257 Page from
ThisAV.com



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VIDEOS

CATEGORIES

PHOTOS

Tags: 古川いおり 永瀬ゆい 渚みつき あべみかこ 相:

Videos ▾

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UPLOAD

2257

ThisAV.com is not a producer (primary or secondary) of any and all of the content found on the website (ThisAV.com). With respect to the records as per 18 USC 2257 for any and all content found on this site, please kindly direct your request to the site for which the content was produced.

ThisAV.com is a video and photo sharing site in which allows for the uploading, sharing and general viewing of various types of adult content and while ThisAV.com does the best it can with verifying compliance, it may not be 100% accurate.

ThisAV.com abides by the following procedures to ensure compliance:

- 1: Requiring all users to be 18 years of age to upload videos.
- 2: When uploading, user must verify the content; assure he/she is 18 years of age; certify that he/she keeps records of the models in the content and that they are over 18 years of age.
- 3: Certify that the content being uploaded is either owned by the user or they are legally licensed to upload, publish, share the content at hand.

For further assistance and/or information in finding the content's originating site, please contact ThisAV.com compliance at compliance@ThisAV.com

ThisAV.com allows content to be flagged as inappropriate. Should any content be flagged as illegal, unlawful, harassing, harmful, offensive or various other reasons, ThisAV.com shall remove it from the site without delay.

Users of ThisAV.com who come across such content it urged to flag it as inappropriate by clicking "flag as inappropriate" link found below each video.

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EXHIBIT E

Advertising Page from
ThisAV.com



HOME

FREE SEX

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VIDEOS

CATEGORIES

PHOTOS

Tags: 古川いおり 永瀬ゆい 渚みつき あべみかこ 相い

Videos ▾

Search

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UPLOAD

ThisAV廣告服務

如要在本網站投放廣告，請聯絡以下代理。Please contact the following agent for advertising on ThisAV.com

Juicy Ads

Contact person: Luke Hanna

email: luke@juicyads.com

skype: luke.hanna.juicyads

Language: English

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EXHIBIT F

User Feedback Page from
ThisAV.com

UPLOAD

川いおり 永瀬ゆい 渚みつき あべみかこ 相沢み

HAVE YOU CHECKED OUT OUR FAQ?

Before sending feedback, you might want to check out our [FAQ page](#). This may answer questions you have about the site, without having to type us a full email. To visit the FAQ page, please [click here](#).

Send

ThisAV is the home for adult sex porn videos & photo albums sharing community online:

Watch thousands of porn videos & photo albums FOR FREE.
Share favorites with friends.
Connect with other users who share your love for sex.
Upload your videos to a worldwide audience.

Sign up now to join the ThisAV community.

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 Copyright © 2009 - This is a free porn site. All Rights Reserved.



EXHIBIT G

Upload Video Page from
ThisAV.com



HOME

FREE SEX

LIVE CAM

VIDEOS

CATEGORIES

PHOTOS

Tags: 川いおり 永瀬ゆい 渚みつき あべみかこ 相沢

Videos ▾

Search

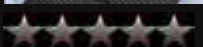
[advanced search]

UPLOAD

QUICK JUMPS

Profile Blog
Photo Albums Playlist
Public Videos Private Videos
Favorite Videos Wall
Friends Subscribers
Subscriptions Inbox

JDOGDOG - PROFILE

[Edit Profile](#) · [Edit Preference](#) · [Change Avatar](#)

0 ratings

Popularity: 10 points
Activity: 0 points
Gender: Male
Joined: 8 minutes ago
Last Login: 5 seconds ago
Profile Views: 1
Videos Watched: 0
Number of views of user's videos: 0

CONTACT - JDOGDOG

Add To Friends Subscribe
 Report User Block User
 Send Message

MORE INFO - JDOGDOG

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VIDEO UPLOAD

By clicking on Upload, you agree that this video does not violate our Terms of Service and that you are willing to provide any 2257 information upon request.

Title:

Tags:

Enter one or more tags, separated by spaces.

Category:

File(10GB Max):

Choose File

No file chosen

Upload Video

Thank you for your contribution. Each video will be converted into a format that is compatible with our systems. This process can take a while to be completed depending on volume. Nevertheless, an email will be sent to you once your video is published!



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EXHIBIT H

Domain Tools for **ThisAV.com**



Home > Whois Lookup > ThiSav.com

Whois Record for ThiSav.com

— Domain Profile

Registrant	Registration Private	
Registrant Org	Domains By Proxy, LLC	
Registrant Country	us	
Registrar	GoDaddy.com, LLC IANA ID: 146 URL: http://www.godaddy.com Whois Server: whois.godaddy.com abuse@godaddy.com (p) 14806242505	
Registrar Status	clientDeleteProhibited, clientRenewProhibited, clientTransferProhibited, clientUpdateProhibited	
Dates	3,945 days old Created on 2009-09-25 Expires on 2021-09-25 Updated on 2016-08-26	
Name Servers	KATE.NS.CLOUDFLARE.COM (has 20,802,934 domains) RAY.NS.CLOUDFLARE.COM (has 20,802,934 domains)	
Tech Contact	Registration Private Domains By Proxy, LLC DomainsByProxy.com, Scottsdale, Arizona, 85260, us thissav.com@domainsbyproxy.com (p) 14806242599 (f) 14806242598	
IP Address	104.27.205.91 - 8 other sites hosted on this server	
IP Location	 - Texas - Dallas - Cloudflare Inc.	
ASN	 AS13335 CLOUDFLARENET, US (registered Jul 14, 2010)	
Domain Status	Registered And Active Website	
IP History	37 changes on 37 unique IP addresses over 11 years	
Registrar History	1 registrar	
Hosting History	17 changes on 8 unique name servers over 11 years	

Website

Website Title	 403 Forbidden	
Server Type	cloudflare	
Response Code	403	
Terms	3 (Unique: 3, Linked: 0)	
Images	0 (Alt tags missing: 0)	
Links	0 (Internal: 0, Outbound: 0)	

Whois Record (last updated on 20200714)



Validation Required

DomainTools is committed to preventing the abuse of Whois data so we now require a CAPTCHA to view the full raw domain name record.

Existing user? Please log in.



I'm not a robot

reCAPTCHA
Privacy - Terms


DomainTools Iris

More data. Better context.
Faster response.

Learn More



Tools

Hosting History	
Monitor Domain Properties	▼
Reverse IP Address Lookup	▼
Network Tools	▼
Buy This Domain ▼	
Visit Website	
 Preview the Full Domain Report	


[View Screenshot History](#)

Available TLDs

General TLDs

Country TLDs

The following domains are available through our preferred partners. Select domains below for more information. (3rd party site)

- ☐ Taken domain.
☐ Available domain.
☐ Deleted previously owned domain.

ThisSav.com	View Whois
ThisSav.net	View Whois
ThisSav.org	Buy Domain
ThisSav.info	View Whois
ThisSav.biz	View Whois
ThisSav.us	View Whois



EXHIBIT I

WhatsmyCDN for
ThisAV.com



What's My CDN?

Global



SUBMIT

Domain: thisav.com

Location**CDN Provider**

Asia

Cloudflare

China

-

North America

Cloudflare

[Submit another query.](#)

Thanks to [LSHIY Group \(蓝视云\)](#) for sponsoring our China VPS server, LSHIY Group is one of the most affordable VPS providers in China.

[Contact us](#) if you want to sponsor our VPS servers in other country or region, thanks.

[About Me](#) | [API](#)

EXHIBIT J

SimilarWeb Analysis
ThisAV.com April to June
2020



JULY 2020

Website Analysis

thisav.com

View the full analysis at:
pro.similarweb.com



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18

TRAFFIC & ENGAGEMENT

Total visits ⓘ

Apr 2020 - Jun 2020 🌐 Worldwide

27.12M

↑ 2.19% from last month

Device distribution ⓘ

Apr 2020 - Jun 2020 🌐 Worldwide



42.11 %

57.89 %

Global Rank

#2,847

Country rank

Japan

#479

Category rank

Adult

#277

Overview ⓘ

Apr 2020 - Jun 2020 📅 All Traffic 🌐 Worldwide

Monthly visits ⓘ

9.040M

Deduplicated audience ⓘ BETA

Pages / Visit ⓘ

13.33

Monthly Unique Visitors ⓘ

Visit Duration ⓘ

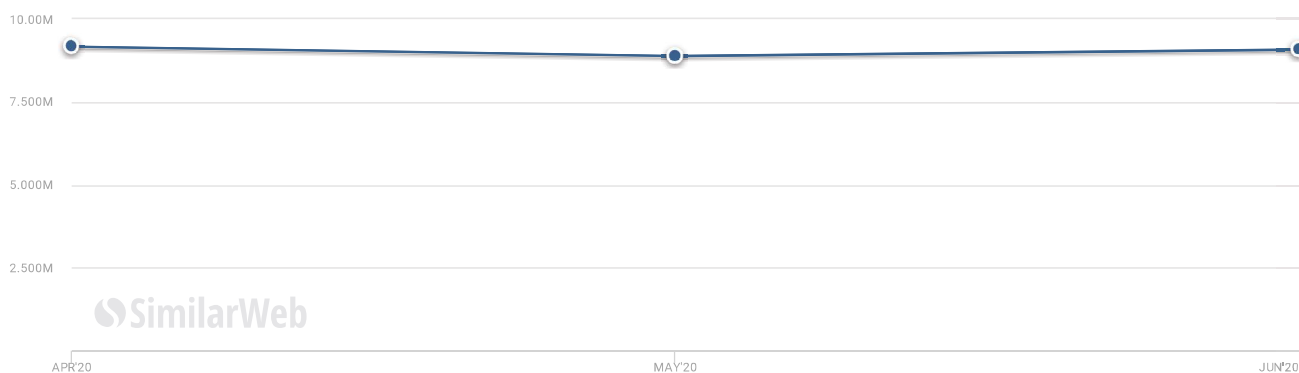
00:09:07

Bounce Rate ⓘ

28.47%

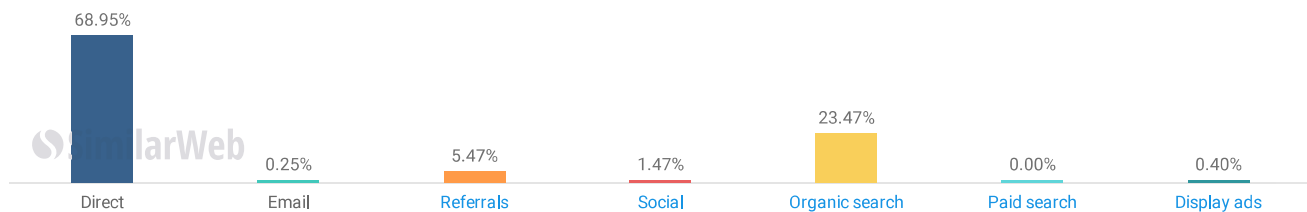
Visits Over Time ⓘ

Apr 2020 - Jun 2020, 📅 All Traffic



Channels Overview ⓘ

Apr 2020 - Jun 2020 🌐 Worldwide 🖥 Desktop Only



GEOGRAPHY

Top countries ⓘ

Apr 2020 - Jun 2020, 🖥 Desktop Only

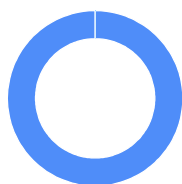


🇯🇵 Japan	50.30%	<div></div>	↓ 0.36%
🇭🇰 Hong Kong	16.61%	<div></div>	↑ 11.89%
🇹🇼 Taiwan	16.10%	<div></div>	↑ 2.7%
🇺🇸 United States	4.31%	<div></div>	↓ 5.65%
🇨🇳 China	3.77%	<div></div>	↓ 10.91%

SEARCH

Search Traffic ⓘ

Apr 2020 - Jun 2020 🌐 Worldwide 🖥 Desktop Only



🔍 Organic 100.00%
💰 Paid 0.00%

Top Search Terms: Organic ▼

Apr 2020 - Jun 2020 🌐 Worldwide 🖥 Desktop Only

🔍 thisav	21.16%	<div></div>	↓ 9.06%
🔍 this av	2.79%	<div></div>	↓ 13.28%
🔍 thisav.com	0.49%	<div></div>	↓ 12.96%
🔍 300maan-545	0.33%	<div></div>	-
🔍 428suke-013	0.19%	<div></div>	↓ 80.45%

REFERRALS

Top Referring Websites ⓘ

Apr 2020 - Jun 2020 🌐 Worldwide 🖥 Desktop Only

🌐 theporndude.com	24.65%	<div></div>	↓ 16.5%
🌐 nudevista.com	11.34%	<div></div>	↑ 1.35%
🌐 jr-idol.net	9.02%	<div></div>	↓ 20.3%
🌐 himitudoga.blog.fc2.com	6.50%	<div></div>	↓ 18.84%
🌐 dl8x.com	4.98%	<div></div>	↓ 17%

Top Referring Categories ⓘ

Apr 2020 - Jun 2020 🌐 Worldwide 🖥 Desktop Only

👤 Adult	88.63%	<div></div>
💻 Programming and Developer S...	1.70%	<div></div>
🔬 Science and Education	0.49%	<div></div>
🔍 Search Engines	0.42%	<div></div>
🌐 Social Networks and Online Co...	0.18%	<div></div>

Top Links Destination ⓘ

Apr 2020 - Jun 2020 🌐 Worldwide 🖥 Desktop Only

intellipopup.com	64.68%	<div><div></div></div>	↓ 11.17%
thisav.54647.io	10.10%	<div><div></div></div>	↓ 15.47%
javhd.com	5.14%	<div><div></div></div>	↓ 7.43%
realsrv.com	2.08%	<div><div></div></div>	↑ 350.63%
sqpgncbm.com	1.73%	<div><div></div></div>	-

Top Ads Destination ⓘ

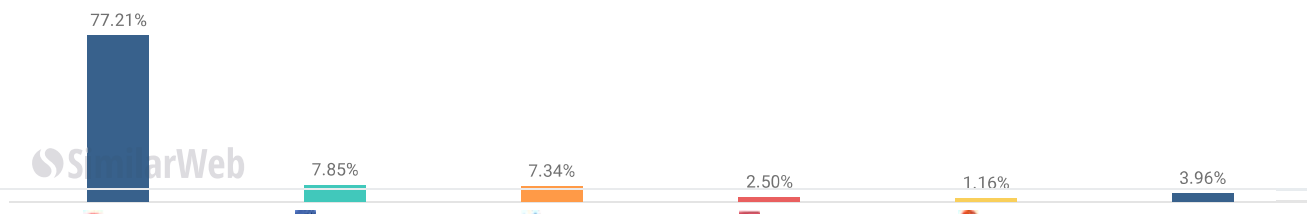
Apr 2020 - Jun 2020 🌐 Worldwide 🖥 Desktop Only

bn.dxlive.com	21.99%	<div><div></div></div>	↓ 52.1%
offers.verajohn.com	15.86%	<div><div></div></div>	↓ 87.6%
bongacams.com	13.70%	<div><div></div></div>	↓ 20.76%
xmtrading.com	13.40%	<div><div></div></div>	-
caolliuu.info	3.26%	<div><div></div></div>	↓ 40.24%

SOCIAL

Social Traffic ⓘ

Apr 2020 - Jun 2020 🌐 Worldwide 🖥 Desktop Only



DISPLAY ADVERTISING

Display Ad Network ⓘ

Apr 2020 - Jun 2020 🌐 Worldwide 🖥 Desktop Only



Top Publishers ⓘ

Apr 2020 - Jun 2020 🌐 Worldwide 🖥 Desktop Only

forum.hkgolden.com	72.16%	<div><div></div></div>	-
jp.pornhub.com	23.32%	<div><div></div></div>	-
tumblr.com	3.73%	<div><div></div></div>	-
mytvsuper.com	0.73%	<div><div></div></div>	-
tubetubetube.com	0.07%	<div><div></div></div>	-

EXHIBIT K

SimilarWeb Analysis
ThisAV.com December
2020 to February 2021



MARCH 2021

Website Analysis

thisav.com

View the full analysis at:
pro.similarweb.com



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18

TRAFFIC & ENGAGEMENT

Total visits ⓘ

Dec 2020 - Feb 2021 Worldwide

28.93M

-12.73% from last month

Device distribution ⓘ

Dec 2020 - Feb 2021 Worldwide



42.20 %

57.80 %

Global rank

#3,144

Country rank

Japan

#460

Category rank

Adult

#312

Engagement overview ⓘ

Dec 2020 - Feb 2021 All Traffic Worldwide



Monthly visits ⓘ

9.644M

Deduplicated audience ⓘ BETA

N/A



Pages / Visit ⓘ

13.29



Monthly Unique Visitors ⓘ

N/A



Visit Duration ⓘ

00:08:50

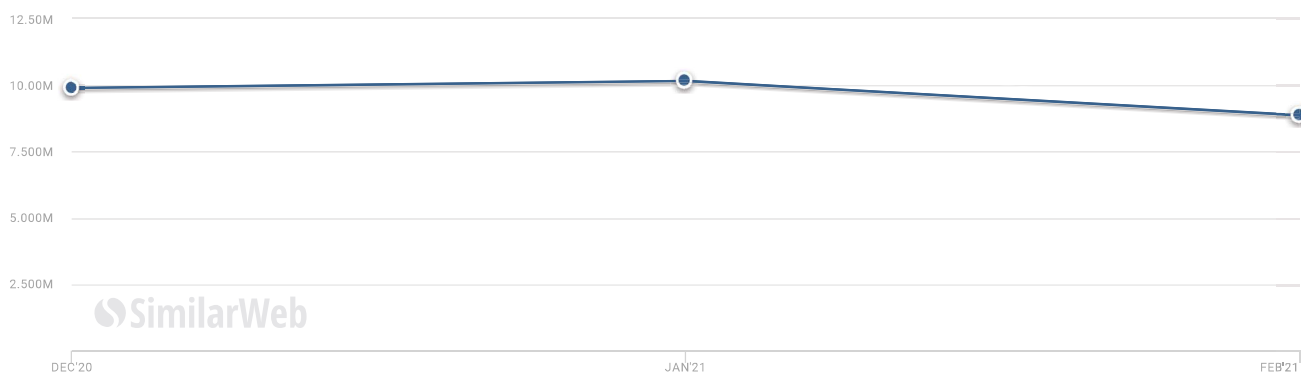


Bounce Rate ⓘ

28.87%

Visits over time ⓘ

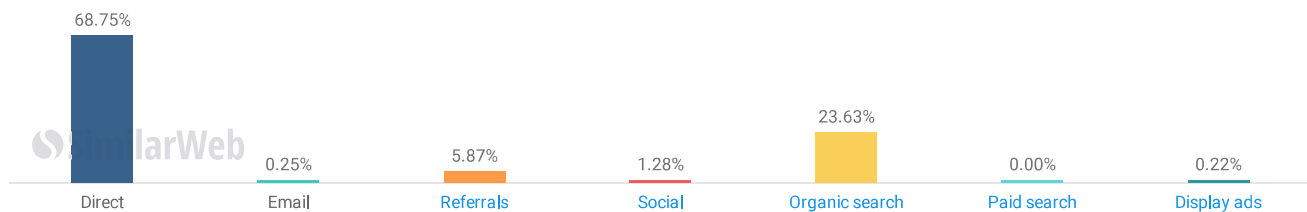
Dec 2020 - Feb 2021, All Traffic



SimilarWeb

Channels overview ⓘ

Dec 2020 - Feb 2021 Worldwide Desktop Only



GEOGRAPHY

Top countries ⓘ

Dec 2020 - Feb 2021, Desktop

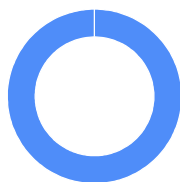


Japan	54.03%	↓ 17.92%
Hong Kong	14.78%	↓ 6.68%
Taiwan	14.75%	↓ 5.64%
United States	4.91%	↓ 4.35%
China	3.19%	↑ 4.75%

SEARCH

Search traffic ⓘ

Dec 2020 - Feb 2021 Worldwide Desktop Only



🔍 Organic 100.00%

💰 Paid 0.00%

Top search terms: Organic ▾

Dec 2020 - Feb 2021 Worldwide Desktop Only

thisav	19.27%	↓ 8.09%
this av	2.74%	↓ 11.83%
thisavcom	0.26%	↓ 31.21%
sex141	0.23%	↑ 24.8%
this av fc2	0.19%	↓ 17.38%

REFERRALS

Top referring websites ⓘ

Dec 2020 - Feb 2021 Worldwide Desktop Only

theporndude.com	25.26%	↓ 2.49%
nudevista.com	8.42%	↓ 8.01%
saveurl.kikinode.net	7.39%	↓ 52.95%
dl8x.com	7.09%	↓ 53.22%
av.av4.xyz	4.36%	↓ 10.76%

Top referring categories ⓘ

Dec 2020 - Feb 2021 Worldwide Desktop Only

Adult	96.94%
Web Hosting and Domain Nam...	0.33%
Search Engines	0.27%
Social Networks and Online Co...	0.15%
Science and Education	0.13%

OUTGOING TRAFFIC

Top link destinations ⓘ

Dec 2020 - Feb 2021 Worldwide Desktop Only

intellipopup.com	56.20%	↓ 8.77%
thisav.54647.site	6.89%	↑ 14.09%
realsrv.com	4.44%	↑ 5.99%
wvekalpmn.com	2.59%	↓ 77.48%
thisav.54647.online	2.28%	-

OUTGOING ADS

Top ad destinations ⓘ

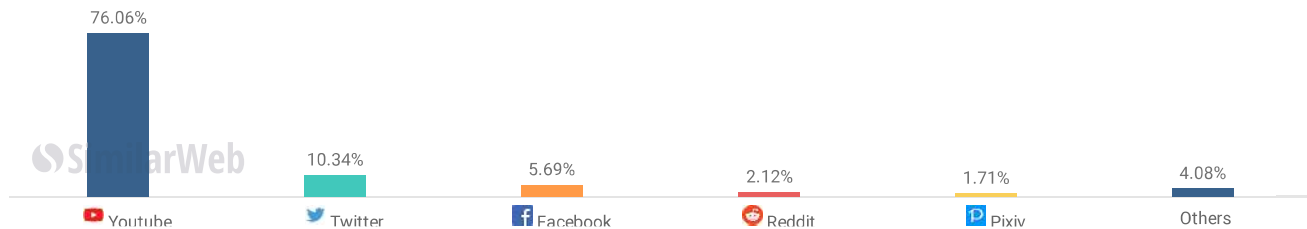
Dec 2020 - Feb 2021 Worldwide Desktop Only

bn.dxlive.com	33.21%	↓ 60.41%
crtbb.livejasmin.com	32.36%	-
bongacams.com	22.02%	↑ 61.43%
dragoncasino7.com	2.20%	-
Upgrade your Account	1.27%	↑ 625.33%

SOCIAL

Social traffic ⓘ

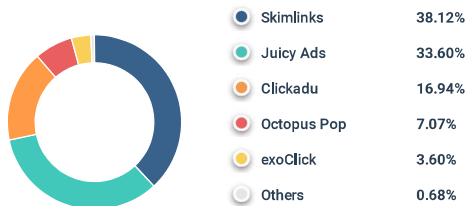
Dec 2020 - Feb 2021 Worldwide Desktop Only



DISPLAY ADVERTISING

Display ad network ⓘ

Dec 2020 - Feb 2021 Worldwide Desktop Only



Top publishers ⓘ

Dec 2020 - Feb 2021 Worldwide Desktop Only

forum.hkgolden.com	82.60%	↑ 17.9%
tw.search.yahoo.com	9.26%	-
javdos.com	7.79%	-
tumbex.com	0.31%	-
momotaroundeshi.blog122.f...	0.03%	-

EXHIBIT L

Excerpts From Gorilla Server Documents

Abuse Reports Identifying IPs for thisav.com

Recipient : support <tech@zenex5ive.com> Sent: Oct/15/2020 1:34:54PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#269571] FWD: [f88424718e88ecd5]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Oct/09/2020 12:59:29AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Cc: tech@zenex5ive.com
Auto-Submitted: no

Subject: [#267762] FWD: 192.200.112.74 [15c7564f3eb931b3]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Oct/03/2020 6:52:06AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#266322] FWD: [24589262345d25db]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. 192.200.112.74

Recipient : support <tech@zenex5ive.com> Sent: Sep/15/2020 2:34:23AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#262324] FWD: 192.200.112.74 [9d19d6c44e335ba0]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Sep/15/2020 2:22:29AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#262319] FWD: 192.200.112.74 [cb346e17f12f21fb]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Sep/14/2020 8:34:38AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#262198] FWD: [acac6672e3b9627b]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Sep/14/2020 1:53:49AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#262113] FWD: [af31e6dd444824ba]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Sep/11/2020 3:39:05AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#261638] FWD: 192.200.112.74 [27c8af84eb12430b]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Sep/10/2020 10:10:34PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#261621] FWD: [152b07e8015c2c2b]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Sep/09/2020 4:03:49AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#261251] FWD: 192.200.112.74 [d581440170f1c8ca]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Sep/01/2020 3:18:14AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#259911] FWD: [261cece22eba7b92]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Aug/30/2020 7:02:03PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#259667] FWD Abuse Report: [Cybertip.ca Report #3993025] Notice and takedown request - 192.200.112.78

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Aug/27/2020 8:21:48AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#259187] FWD: 192.200.112.74 [576db1d9bbcfa21d]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Aug/24/2020 11:00:45PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#258850] FWD: [afaf86da95637e11]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. - 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Aug/24/2020 12:54:14AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#258698] FWD: [482fee8fa0d3e69e]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Aug/11/2020 12:48:03AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#257697] FWD: [97c5d911f22ed6ff]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Aug/10/2020 3:01:07PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject:  [#257671] FWD Child Exploitation: Notice of Possible Child Exploitation on Your Service - Special Notice Provided While NCMEC is on Telework due to COVID-19 Concerns, Please Review Carefully 192.200.112.78

Recipient : support <tech@zenex5ive.com> Sent: Aug/05/2020 8:58:30AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#257340] FWD: [1097fa72a75f1353]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Jul/31/2020 8:36:52AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#257152] FWD: 192.200.112.74 [5f5934aa19c28179]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Jul/30/2020 2:16:23PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#257118] FWD: [a7f47052df3b28c9]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Jul/21/2020 2:19:18PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

→ Subject: [#256677] FWD Child Exploitation: Notice of Possible Child Exploitation on Your Service - Special Notice Provided While NCMEC is on Telework due to COVID-19 Concerns, Please Review Carefully 192.200.112.78

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Jul/05/2020 8:23:49AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#256085] FWD: [77380b185e349a24]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Jun/10/2020 8:36:59PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#255231] FWD: [ce875f08eae87f0e]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. - 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Jun/03/2020 8:47:12PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#254962] FWD: [3945aad51a5b0964]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. - 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: May/14/2020 9:25:40PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#254208] FWD: [IMPORTANT] COPYRIGHT and TRADEMARK infringement 'thisav.com' 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: May/13/2020 1:56:49PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

→ Subject: [#254162] FWD Child Exploitation: Notice of Possible Child Exploitation on Your Service - Special Notice Provided While NCMEC is on Telework due to COVID-19 Concerns, Please Review Carefully 192.200.112.78

Recipient : support <tech@zenex5ive.com> Sent: Apr/23/2020 1:30:41PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

→ Subject: [#253334] FWD Child Exploitation:192.200.112.74FWD Child Exploitation:192.200.112.74 Notice of Possible Child Exploitation on Your Service - Special Notice Provided While NCMEC is on Telework due to COVID-19

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Apr/03/2020 1:30:26PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

→ Subject: [#252369] FWD Notice of Possible Child Exploitation on Your Service - Special Notice Provided While NCMEC is on Telework due to COVID-19 Concerns, Please Review Carefully Child Exploitation:192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Apr/02/2020 5:52:51AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Cc: tech@zenex5ive.com
Auto-Submitted: no

→ Subject: [#252292] FWD Child Exploitation:192.200.112.74 [985703f7c8e4d7b2]: Cloudflare received a child pornography report regarding one of your customers.

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Mar/30/2020 3:32:31AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#252087] FWD: [127148fd7d07a981]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Mar/20/2020 8:50:56AM

Headers: From: builds@gorillaservers.com
Reply-To: builds@gorillaservers.com
Auto-Submitted: no

Subject: [#251576] OGDEN New Server Order Service ID #14912, Dual Xeon E5-2660v2, 128GB DDR3 ECC, 40 x 8TB Enterprise SAS HDD, HW RAID-10, 1Gbps Unmetered Port, Enable IPMI, CentOS 7, /29 IP Allocation

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Mar/20/2020 8:50:13AM

Headers: From: builds@gorillaservers.com
Reply-To: builds@gorillaservers.com
Auto-Submitted: no

Subject: [#251575] OGDEN New Server Order Service ID #14911, Dual Xeon E5-2660v2, 128GB DDR3 ECC, 40 x 8TB Enterprise SAS HDD, HW RAID-10, 1Gbps Unmetered Port, Enable IPMI, CentOS 7, /29 IP Allocation

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Jan/22/2020 5:09:14PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#248958] FWD: [153736c95b4c45c4]: Cloudflare received an abuse report regarding one of your customers. - 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Jan/10/2020 12:55:06PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#248359] FWD Abuse Report: [1c4d05083fbc03f3]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Jan/01/2020 7:36:25AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#247827] FWD Abuse Report: 192.200.112.74 [547137841e1b9386]: Cloudflare received an abuse report regarding one of your customers.

Recipient: ka yeung lee <panda4uhk@gmail.com> Sent: Dec/11/2019 6:50:40AM
:
Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no
Subject: [#246942] FWD: 192.200.112.74 [7558941a12b0f422]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient: ka yeung lee <panda4uhk@gmail.com> Sent: Dec/02/2019 1:52:18AM
:
Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no
Subject: [#246416] FWD: [fc9ec05479e2790e]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient: ka yeung lee <panda4uhk@gmail.com> Sent: Nov/26/2019 10:21:58AM
:
Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no
Subject: [#246168] FWD Child Exploitation: [Cybertip.ca Report #2789265] Notice and takedown request 192.200.112.78

Recipient: ka yeung lee <panda4uhk@gmail.com> Sent: Aug/23/2019 7:31:01PM
:
Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no
Subject: [#240832] FWD Child Exploitation Multiple: 192.200.112.78

Recipient: ka yeung lee <panda4uhk@gmail.com> Sent: Aug/13/2019 12:55:45PM
:
Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no
Subject: [#239995] FWD Child Exploitation: Notice of Possible Child Exploitation On Your Service 192.200.112.74

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Jul/03/2019 8:52:41AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

→ Subject: [#237023] FWD Child Exploitation:Notice of Possible Child Exploitation On Your Service 192.200.112.78

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Jul/02/2019 10:32:45PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

→ Subject: [#236992] FWD Child Exploitation:Notice of Possible Child Exploitation On Your Service - 192.200.112.78

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Mar/08/2019 2:22:55AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Cc: tech@zenex5ive.com
Auto-Submitted: no

Subject: [#229625] FWD: 104.250.148.122 [74f2894fla40350a]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Jan/10/2019 8:06:07AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#226007] FWD: 104.250.148.122 [8b62480f4eed2792]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Jan/10/2019 4:06:24AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#225998] FWD Abuse Report: [8b62480f4eed2792]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. - 104.250.148.122

Recipient : support <tech@zenex5ive.com> Sent: Sep/26/2018 5:30:08AM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

→ Subject: [#218069] FWD: 104.250.148.122 [455d9a7cfd1c1aa7]: Cloudflare received a child pornography report regarding one of your customers.

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Aug/30/2018 4:57:22PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#215864] FWD: [65c68bbd4a645f7c]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. 104.250.148.122

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: Aug/30/2018 4:56:35PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#215863] FWD: [c2f27e935a60bb7a]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. 104.250.148.122

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: May/29/2018 2:55:23PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#208261] FWD: 104.250.148.122 [fca27ac02564ccaf]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient : ka yeung lee <panda4uhk@gmail.com> Sent: May/07/2018 12:12:03PM

Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no

Subject: [#206556] FWD: 104.250.148.122 [42d11df72c00bbfa]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient: ka yeung lee <panda4uhk@gmail.com> Sent: May/01/2018 9:05:55AM
Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no
Subject: [#206091] FWD: 104.250.148.122 IWF report JA-1334384

Recipient: ka yeung lee <panda4uhk@gmail.com> Sent: Mar/07/2018 4:09:34PM
Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no
Subject: [#202163] FWD: 104.250.148.122 [df9c9507e5610ee2]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient: ka yeung lee <panda4uhk@gmail.com> Sent: Jan/19/2018 10:56:43AM
Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no
Subject: [#199194] FWD: 104.250.148.122 Notice of Possible Child Exploitation On Your Service

Recipient: ka yeung lee <panda4uhk@gmail.com> Sent: Jan/12/2018 9:55:59AM
Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no
Subject: [#198659] FWD: 104.250.148.122 Notice of Possible Child Exploitation On Your Service

Recipient: ka yeung lee <panda4uhk@gmail.com> Sent: Sep/21/2017 7:22:04AM
Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Auto-Submitted: no
Subject: [#190449] FWD Abuse Report: [30aef531bddf78d4]: Cloudflare received an abuse report regarding one of your customers. -104.250.148.122

Recipient: ka yeung lee <panda4uhk@gmail.com> Sent: Aug/16/2017 4:37:29PM
:
Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Subject: [#187869] FWD: [6128f903e0e8b6f2]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. 104.250.148.122

Recipient: ka yeung lee <panda4uhk@gmail.com> Sent: Jul/06/2017 6:11:21PM
Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Subject: [#183888] FWD: Notice of Copyright Infringement 104.250.148.122

Recipient: ka yeung lee <panda4uhk@gmail.com> Sent: Jul/05/2017 3:33:38PM
:
Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Subject: [#183724] FWD: 104.23.131.82 [b5d37961ceb1666]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers.

Recipient: ka yeung lee <panda4uhk@gmail.com> Sent: Feb/09/2017 2:18:07PM
:
Headers: From: abuse@GorillaServers.com
Reply-To: abuse@GorillaServers.com
Subject: [#165899] FWD: [a1e0d70de8e7ea74]: Cloudflare received a DMCA copyright infringement complaint regarding one of your customers. - 104.250.148.122